

ORIGINAL



0000035471

**INTERVENTION**  
**BEFORE THE ARIZONA CORPORATION COMMISSION**

**COMMISSIONERS:**

JEFF HATCH-MILLER – Chairman  
WILLIAM A. MUNDELL  
MARC SPITZER  
MIKE GLEASON  
KRISTIN K. MAYES

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AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF THE AUDIT OF THE FUEL ) DOCKET NO. E-01345A-05-0827  
AND PURCHASED POWER PRACTICES AND )  
COSTS OF ARIZONA PUBLIC SERVICE )  
COMPANY )

**MOTION TO INTERVENE**

UniSource Energy Services (“UES”), through undersigned counsel, and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission (“Commission”) for an order allowing UES to intervene in the above captioned proceeding. In support hereof, UES states as follows:

1. UES is a subsidiary of UniSource Energy Corporation. UES, through its subsidiaries, UNS Electric, Inc. and UNS Gas, Inc. operates the Arizona electric and gas systems formerly owned by Citizens Communications.<sup>1</sup>

2. UES is directly and substantially affected by the issues to be addressed in this proceeding.

3. No other party could adequately represent the interests of UES. UES’ involvement in this case will not broaden the issues of APS’ application, nor will it unduly prejudice APS or any other interested persons.

4. Service of all correspondence, documents or pleadings should be made to counsel for UES as follows:

<sup>1</sup> UES, UNS Gas, Inc. and UNS Electric, Inc. shall be collectively referred to hereinafter as “UES.”

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WHEREFORE, for all the foregoing reasons, UniSource Energy Services respectfully requests that the Presiding Hearing Officer issue an order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of December 2005.

ROSHKA DEWULF & PATTEN, PLC

By



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and

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Attorneys for UniSource Energy Services

1 Original and 13 copies of the foregoing  
2 filed this 1<sup>st</sup> day of December 2005 with:

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 West Washington Street  
6 Phoenix, Arizona 85007

7 Copy of the foregoing hand-delivered/mailed  
8 this 1<sup>st</sup> day of December 2005 to:

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